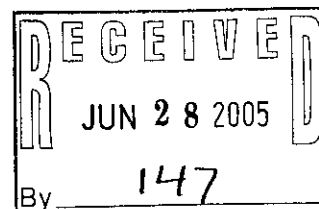




Established in 1916

CASTLE ROCK BANK

Daniel H. Nicolai, President



June 20, 2005

Robert E. Feldman
Executive Secretary
Attn: Comments
FDIC
550 17th St. NW
Washington, DC 20429

RE: Classification of Commercial Credit Exposures

Dear Sir,

We have reviewed FIL-222005.

It is our consensus that the proposal really does not present anything new. The proposal simply restates the basic tenets that have been used for many years. Failures, or problems, that occurred using the present system of identification were due to administrative negligence or carelessness and not due to the system itself.

I envision that installation of a new system would cause extensive administrative burden and thus, additional cost to borrowers

Sincerely yours,

Daniel H. Nicolai
President

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